

Daggett

TRUCK LINE, Inc.

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Federal Highway Administration
Office of the Chief Counsel
HCC-10
Room 4232, 400 Seventh St. S.W.
Washington D.C. 20590

QA-20672

FHWA-97-2299-52

Dear Sir:

I am the current President of our family owned trucking company that began operations in 1930. I have worked with this Company all of my life. We operate around 110 trucks throughout the United States and Southern Canada hauling primarily food products.

During a recent safety audit, I became distressed to find out how much weight is put on drivers' log book records. Especially when one realizes that the rules for these logs records are over fifty years old.

Our firm has always stressed a safe operating policy, both in our shop and on the road. Our accident ratio of .095 testifies to this. (The audit inspector told us the national average was .43 accident per million miles.)

However, solely because of the number of log book violations, our Company received a Conditional safety rating, I believe for the first time in our history.

It appears to me the government regulators are forcing a carrier to punish our drivers for poor paperwork in spite of their excellent work performance. This reminds me of a teacher who wanted to reward his good student with a scholarship, but instead, had to punish him for bad penmanship.

Beginning in 1956, our Company has been recognizing and rewarding drivers with annual Safe Driving Awards and gifts. Daggett Truck Line is financially secure so the cost of adding the equivalent of another person to our office solely for checking each log against fuel slips, tolls, lumber receipts, etc. should not significantly affect us. However, I believe this to be an unnecessary expenditure of financial resources. If a carrier were to

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have a limited Administration Budget, then they might be forced to dip into maintenance or safety to pay for this extra person just to make sure the drivers are not making a mistake on their logs.

We firmly believe and endorse roadside inspections. They force our competitors to maintain their trucks to the same standards we stress. However, on any one day, I can find a equipment violation on any of our trucks, if I look hard enough. I believe I could also do this to any government vehicle or to any commercial aircraft, again, if I looked hard enough. The violation will probably have nothing to do with the safe operation of the truck, car or airplane, but technically it is a violation.

Our trucks and our employees work in a real world seven days a week. Our Company is good, but we are not perfect. We ask that for any inspection or audit, a degree of common sense is applied.

Truck drivers enjoy their work. They are not line assembly workers or desk persons. The independent life and control truck driving affords, gives them freedom to perform their work efficiently. However, the cost of being separated from your family is a big drawback of their job. Increased and unnecessary government penalties, when you are performing safe work, will probably further deplete the understaffed industry we presently have.

Safety ratings should be based on the overall performance of a carrier and their employees, not only, or even mainly, on a driver's paperwork.

Sincerely,
DAGGETT TRUCK LINE, Inc.



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